

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address

Onyinye Anyama Esq. (SBN: 262152)
Anyama Law Firm | A Professional Law Corporation
18000 Studebaker Road, Suite 325
Cerritos, California 90703
Tel. (562) 645-4500; Fax: (562) 318-3669
E-mail: info@anyamalaw.com

FOR COURT USE ONLY

☐ Individual appearing without attorney
☒ Attorney for: Debtor and Debtor in Possession

In re:
FAITH STOREY

CASE NO.: 2:20-bk-20047-SK
CHAPTER: 11

Debtor(s).

Sale Date: 12/15/2021

Time: 9:00 am

Location: CrtRm: 1575 255 E Temple Street. Los Angeles, CA 90012

Type of Sale: ☐ Public ☐ Private

Last date to file objections:_____

708 N. Eucalyptus Ave. # 108, Inglewood, CA 90302

- a) Buyers have offered an initial deposit of \$12,450.00; a financing loan (Buyer Finance Loan) of \$332,000.00 and the Balance of purchase price of \$70,550.00 to be deposited with Escrow Holder
- b) Approval of the termite report and any physical inspection results
- c) Approval of Title;
- d) A 5.50% of commission on the sale price to be split evenly between the listing and selling agent.

Proposed sale price: \$ 415,000.00

Overbid procedure (if any):

- a. Only qualified bidders may submit an overbid. A "qualified bidder" is one who provides evidence of available funds and/or prequalification for any loan upon which the bidder will rely in funding the bid, a financial statement, and such business and banking references as are required in Debtor's reasonable discretion sufficient to assure Debtor of the bidder's ability (based upon availability of financing, experience or other conditions) to consummate the purchase of the real property on the same terms and conditions, other than price, as those proposed in the purchase agreement.
- b. Each bid must be upon the same terms and conditions, other than the price as those proposed in the purchase agreement. Overbids will be evaluated based upon a baseline offer of \$415,000.00, assuming a full commission of 5.5%.
- c. All Interested bidders must contact Debtor's counsel no later than 7 days prior to the hearing scheduled for this motion and provide proof of funds and/or loan qualification to allow Debtor sufficient time to confirm that proof. Debtor's counsel's contact information is set forth on page 1 of this Motion.
- d. The initial minimum overbid must be at least \$10,000 over the line offer of \$415,000.00 or \$425,000.00. Subsequent bidding increments shall be \$5,000.00, or such increments as the court may establish.
- e. A qualified bidder must agree to pay into escrow, in addition to the purchase price, an amount up to \$1,500 for the reimbursement of the actual case-related expenses of Buyers (including inspection and appraisal fees), pursuant to an appropriate demand and subject to Debtor's review and approval prior to distribution.
- f. A qualified bidder must be prepared to make an "earnest money" deposit of \$12,450.00 before confirmation of the sale by the court, said deposit shall become Non-refundable upon Court approval of sale to the qualified bidder. Debtor will not request confirmation of any bid without the deposit. Such payment to be by way of prior wire transfer to Debtor's Counsel's Trust Account or tender of a cashier's check to Debtor's Counsel no later than the commencement of bidding.
- g. A qualified bidder must be prepared to close escrow within forty-five (45) calendar days following the hearing on the Motion, with the remaining sales proceeds transferred to escrow in time to confirm the funds before closing. All funds must be wire-transferred by arrangement with Debtor's counsel.

If property is to be sold free and clear of liens or other interests, list date, time and location of hearing:

HEARING DATE

Date: December 15, 2021

Time: 9:00 AM

Ctrm: 1575

Place: 255 E. Temple Street, Los Angeles, CA 90012

Contact person for potential bidders (include name, address, telephone, fax and/or email address):

Onyinye N Anyama, Esq.

Anyama Law Firm | A Professional Law Corporation

18000 Studebaker Road, Suite 325

Cerritos, California 90703

Tel. (562) 645-4500; Fax: (562) 318-3669

E-mail: info@anyamalaw.com

Date: 11/12/2021

In re:
Faith Storey

Debtor(s).

CHAPTER: **13**

CASE NUMBER: **2:20-bk-20047-SK**

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

**18000 Studebaker Road
Suite 325
Cerritos, CA 90703**

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF CONTINUED SALE OF REAL PROPERTY FREE AND CLEAR OF DESIGNATED LIEN, PROVIDING FOR OVERBIDS, AND FOR ANCILLARY RELIEF** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **11/12/2021**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Onyinye N Anyama

onyi@anyamalaw.com, anyamainfo@gmail.com; info_anyama@ecf.courtdrive.com;

r44596@notify.bestcase.com

Shraddha Bharatia

notices@becket-lee.com

Sean C Ferry

sferry@raslg.com, sferry@ecf.courtdrive.com

Ron Maroko

ron.maroko@usdoj.gov

Kirsten Martinez

Kirsten.Martinez@bonialpc.com

Austin P Nagel

edward.yoo@bonialpc.com

Valerie Smith

claims@recoverycorp.com

United States Trustee (LA)

ustregion16.la.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On **11/12/2021**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

HONORABLE SANDRA R. KLEIN

U.S. BANKRUPTCY JUDGE

255 E. Temple St. Suite 1582

Los Angeles, CA 90012

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on ____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

11/12/2021

Onyinye N. Anyama

Date

Printed Name

/s/Onyinye N. Anyama

Signature

ADDITIONAL SERVICE LIST:

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

In re:

Faith Storey

Debtor(s).

CHAPTER 13

CASE NUMBER **2:20-bk-20047-SK**

Sean C Ferry
Robertson, Anschutz & Schneid, LLP
Authorized Agent for Secured Creditor
350 10th Avenue, Suite 1000
San Diego, CA 92101 Telephone: 470-321-7112

Shraddha Bharatia,
Claims Administrator
Becket & Lee LLP
POB 3001
Malvern, PA 19355-0701

Secured Creditors
(Via Certified/Overnight Mail)

Ocwen Loan Servicing, LLC
Attn: Cashiering Department
1661 Worthington Road, Suite 100
West Palm Beach FL 33409-0000

Bonial & Associates,
Kirsten Martinez
P.C. 3160 Crow Canyon Place,
Suite 215 San Ramon, California 94583

Vw Credit Inc
P.o. Box 3
Hillsboro OR 97123-0000

Barret Daffin Frappier Treder & Weiss, LLP
4004 Belt Line Road Suite 100
Addison, TX 75001-4320

Unsecured Creditors
(Note this category also contains all general unsecured creditors)

Dept Of Ed/Navient
Po Box 9635
Wilkes Barre, PA 18773

Progresive Leasing
Headquarters
256 w Data Drive
Draper UT 84020-0000

Quantum3 Group, LLC
Attn: Kelly Gage
As Agent for MOMA Funding, LLC
P.O. Box 788
Kirkland, WA 98083-0788